

## Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claims 1, 11, 16 and 35 have been amended. Claims 2, 7, 12 and 34 were previously canceled. No claims have been added or canceled. Thus, claims 1, 3-6, 8-11, 13-33 and 35-40 are pending.

### AMENDMENTS TO THE SPECIFICATION

Paragraph 0042 has been amended. The amendments are supported by paragraph 0020 of the application incorporated by reference in paragraph 0013 of the present application. Therefore, no new matter has been added.

### CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 1, 3-5, 11, 13-20, 23 and 35-40 were rejected as being unpatentable over U.S. Patent No. 6,266,341 issued to Surprenant, et al. (*Surprenant*) in view of U.S. Patent No. 6,674,750 issued to Castellano (*Castellano*). For at least the reasons set forth below, Applicants submit that claims 1, 3-5, 11, 13-20, 23 and 35-40 are not rendered obvious by *Surprenant* and *Castellano*.

Claim 1 recites:

a plurality of interface cards coupled to the backplane, the interface cards coupled to receive multiple channels of network traffic from external sources, the plurality of interface cards to receive one or more channels of data according to a time division multiplexed (TDM) protocol and one or more channels of data according to a second protocol, the interface cards to convert data received according to the TDM protocol and the data received according to the second protocol to the internal cell format and to route the channels of data *for asynchronous transmission* over the backplane using the single internal cell format to one or more

predetermined interface cards coupled to the backplane within the network switch, wherein the cell format comprises one or more slots for TDM traffic, one or more slots for non-TDM traffic and one or more slots for overhead.

Similarly, claim 11 recites:

routing the channels of data in the internal cell format via an asynchronous backplane connection to one or more predetermined destinations.

Claim 35 recites:

a plurality of ingress interface cards coupled to the backplane to receive multiple channels of network traffic from external sources, to receive one or more channels of data according to a time division multiplexed (TDM) protocol and one or more channels of data according to a second protocol, to convert the TDM data and the data according to the second protocol to an internal cell format, wherein the cell format comprises one or more slots for TDM traffic, one or more slots for non-TDM traffic and one or more slots for overhead, and to route the channels of data asynchronously over the backplane using the internal cell format to one or more egress interface cards coupled to the backplane.

Thus, Applicants claim conversion of TDM data and other protocol data to an internal cell format having slots for TDM traffic, non-TDM traffic and overhead for transmission over a backplane and asynchronous transmission of the data over a backplane. Claim 16 is a means plus function claim that recites limitations similar to claim 11.

*Surprenant* discloses communication of TDM data over a bus, but not conversion of TDM data and other protocol data to an internal cell format for transmission.

Therefore, *Surprenant* cannot teach or suggest conversion of data to an internal cell format for asynchronous transmission. *Castellano* discloses transmission of multiple formats over a shared bus. However, data according to the multiple formats is not converted to an internal cell format for asynchronous transmission. Because neither *Surprenant* nor *Castellano* can teach or suggest conversion of data to an internal cell

format for asynchronous transmission, no combination of *Surprenant* and *Castellano* can render the invention as claimed obvious.

Claims 3-5, 20 and 23 depend from claim 1. Claims 13-15 depend from claim 11. Claims 17-19 depend from claim 16. Claims 36-40 depend from claim 35. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 3-5, 13-15, 17-20, 23 and 36-40 cannot be rendered obvious by *Surprenant* and *Castellano*.

Claims 21, 22, 24, 25, 29, 31 and 32 were rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of *DeNap*. Claims 21, 22, 24, 25 and 29 depend from claim 1. Claim 31 depends from claim 11 and claim 32 depends from claim 16. *DeNap* is cited to teach used of optical signals. However, *DeNap* does not cure the deficiencies of *Surprenant* and *Castellano*. Therefore, no combination of *Surprenant*, *Castellano* and *DeNap* teaches or suggests the invention as claimed in claims 21, 22, 24, 25, 29, 31 and 32.

Claims 27, 28 and 30 were rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of *Degges* and *DeNap*. *Degges* discloses a switching matrix for T1 frames. See col. 4, lines 5-10. *Degges* discloses use of only T1 frames. Therefore, *Degges* does not teach or suggest conversion of TDM data and second protocol data to an internal cell format. *DeNap* is cited to teach used of optical signals. T1 frames can be carried as optical signals. Therefore, no combination of *Surprenant*, *Castellano*, *Degges* and *DeNap* teaches or suggests the invention as claimed in claims 27, 28 and 30.

Claim 33 was rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of U.S. Patent No. 5,541,921 issued to Swenson, et al. (*Swenson*). *Swenson* is cited to teach a plurality of buffers to interface a backplane. However, *Swenson* is not cited to teach, nor does *Swenson* teach or suggest conversion of TDM traffic and second protocol data to an internal cell format. Therefore, *Swenson* does not cure the deficiencies of *Surprenant* and *Castellano*. Accordingly, no combination of *Surprenant*, *Castellano* and *Swenson* can teach or suggest the invention as claimed in claim 33.

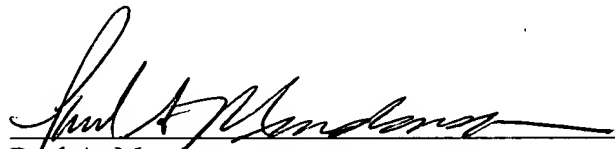
Claim 34 was rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of *Degges* and *Swenson*. Claim 34 was previously canceled. Therefore, the rejection of claim 34 is moot.

CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1, 3-6, 8-11, 13-33 and 35-40 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,  
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